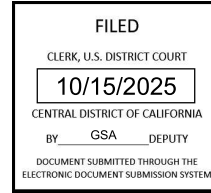


Ashley Richardson
25399 Markham Ln,
Corral De Tierra, CA 93908
(310) 490-2476 |
ashrichardson@mac.com



IN PRO PER
UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

TAYLOR THOMSON,

Plaintiff and Counterclaim

Defendant

vs.

ASHLEY RICHARDSON,

Defendant and Counterclaim

Plaintiff

Case No.: 2:23-cv-04669-MEMF-MAR

DECLARATION OF ASHLEY
RICHARDSON IN SUPPORT OF
OPPOSITION TO PLAINTIFF'S EX PARTE
APPLICATION

**DECLARATION OF ASHLEY RICHARDSON IN SUPPORT IN SUPPORT OF
OPPOSITION TO PLAINTIFF'S EX PARTE APPLICATION**

I, Ashley Richardson, declare:

DECLARATION OF ASHLEY RICHARDSON IN SUPBORT OF OPPOSITION TO PLAINTIFF'S EX PARTE
APPLICATION -

- 1 1. I am the Defendant, proceeding pro se. I make this declaration based on personal
2 knowledge.
- 3 2. On October 10, 2025, the Magistrate Judge granted both sides' motions to compel and
4 ordered us to meet and confer in good faith to determine mutually agreeable dates and
5 locations for the depositions, while denying any request to extend the discovery cut-off.
6
- 7 3. On October 13–14, I told Plaintiff I would be deposed immediately, including on October
8 14 or 15, and I asked Plaintiff to provide near-term dates for Ms. Thomson so we could
9 schedule both depositions as the Court ordered I also agreed to a limited extension if we
10 could agree on setting both depositions before the end of October. Plaintiff refused to
11 provide dates and instead said it would move ex parte to extend deadlines. See Plaintiff's
12 Exhibit A email chain attached to its application.
- 13 4. For over a year, I have sought Ms. Thomson's deposition. Plaintiff has repeatedly
14 avoided providing dates, which is why I moved to compel. The Magistrate Judge granted
15 my motion on October 10.
- 16 5. I remain ready to sit promptly and to complete both depositions in the next two weeks at
17 a reasonable Central District location.

18
19
20 I declare under penalty of perjury that the foregoing is true and correct. Executed October 15,
21 2025, in Monterey California.

22
23
24 Respectfully submitted,

25
26 Ashley Richardson

27
28 DECLARATION OF ASHLEY RICHARDSON IN SUPPORT OF OPPOSITION TO PLAINTIFF'S EX PARTE
APPLICATION -

Dated October 15, 2025.

A handwritten signature in black ink, appearing to be 'AR', followed by a horizontal line.

Ashley Richardson

In Pro Per

DECLARATION OF ASHLEY RICHARDSON IN SUPPORT OF OPPOSITION TO PLAINTIFF'S EX PARTE APPLICATION -

PROOF OF ELECTRONIC SERVICE

On October 15, 2025, I served the documents described as:
Plaintiffs opposition to motion to dismiss
on all interested parties in this action by emailing a true and correct copy
thereof addressed to:

Kristin Hovsepyan	Jeff Topor
<u>Kristina.Hovsepyan@wbd-us.com</u>	<u>Jeff.Topor@wbd-us.com</u>

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 15, 2025 at Los Angeles, CA.

Marley West

